

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 5:21-cv-0137-FL

360 VIRTUAL DRONE SERVICES)
LLC and MICHAEL JONES,)
)
Plaintiffs,)
)
v.)
)
ANDREW L. RITTER, in his official)
capacity as Executive Director of the)
North Carolina Board of Examiners for)
Engineers and Surveyors; and JOHN)
M. LOGSDON, JONATHAN S. CARE,)
DENNIS K. HOYLE, RICHARD M.)
BENTON, CARL M. ELLINGTON, JR,)
CEDRIC D. FAIRBANKS, BRENDA L.)
MOORE, CAROL SALLOUM, and)
ANDREW G. ZOUTWELLE, in their)
official capacities as members of the)
North Carolina Board of Examiners for)
Engineers and Surveyors,)
)
Defendants.)

**JOINT MOTION TO MODIFY
CASE MANAGEMENT ORDER**

NOW COME the parties and hereby move to modify the Pretrial Order and Case Management Plan to extend the expert witness deadlines for Defendant and the rebuttal deadline for Plaintiff. In support of the motion, the parties respectfully show the following:

1. The Case Management Order was filed by the Court on June 25, 2021.
2. Plaintiffs served an expert report on October 15, 2021. The parties are working on scheduling the deposition of Plaintiffs' expert witness.

3. To allow time for the deposition of Plaintiffs' expert witness, the parties seek to extend Defendants' expert witness disclosure deadline by 15 days, up to and including December 1, 2021.

4. Likewise, the parties seek to extend the time for the disclosure of rebuttal experts up to and including January 7, 2022.

5. The motion to modify the expert witness disclosure deadlines will not impact the discovery deadline of February 25, 2022.

WHEREFORE, the parties pray the Court to enter an order modifying the Case Management Order to extend the deadline for Defendants to disclose and serve expert reports up to and including December 1, 2021, and to extend the deadline for rebuttal experts up to and including January 7, 2022.

Respectfully submitted this the 2nd day of November, 2021.

GRAEBE HANNA & SULLIVAN, PLLC

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** Special Appearance pursuant to Local Rule
83.1(e)*

/s/ David G. Guidry

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*Local Civil Rule 83.1(d) Counsel for
Plaintiffs*

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing **JOINT MOTION TO MODIFY CASE MANAGEMENT ORDER** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

David G. Guidry, Mainsail Lawyers, dguidry@mainsaillawyers.com

Samuel B. Gedge, Institute for Justice, sgedge@ij.org

James T. Knight II, Institute for Justice, jknight@ij.org

This the 2nd day of November, 2021.

/s/ Douglas W. Hanna

Douglas W. Hanna, NCSB #18225